

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

PAULA HOWARD

Plaintiff

v.

PROVISO TOWNSHIP HIGH SCHOOL SD 209  
BOARD OF EDUCATION and PROVISO  
TOWNSHIP HIGH SCHOOL SD 209

Defendants

No. 1:21-CV-03573

**DEFENDANT’S SUPPLEMENT TO MOTION TO ENFORCE SETTLEMENT  
AGREEMENT AND FOR ATTORNEY FEES**

Proviso Township High School District 209 Board of Education (Board of Education), through its attorneys, CLAUSEN MILLER, P.C., also incorrectly sued as “Proviso Township High School SD 209,” files its supplement to motion to enforce the settlement agreement entered into between the Board of Education and Paula Howard (Plaintiff) and for attorney fees for Plaintiff’s bad faith refusal to execute the Release of All Claims formalizing the settlement agreement reached on April 11, 2022.

1. As addressed in the Board of Education’s motion (Doc. 30), Plaintiff filed a complaint with the Illinois Human Rights Commission.
2. In addition to the motion to enforce and for fees filed before this Court (Doc. 30), the Board of Education filed a motion to dismiss the action pending before the Illinois Human Rights Commission based on what the Board of Education argued was a valid settlement agreement entered into on April 11, 2022.

3. On September 14, 2022, Chief Administrative Law Judge Brian Weinthal entered a Recommended Order and Decision granting the Board of Education's motion to dismiss. A copy is attached to this document as Exhibit 13.
4. At page 26 of his Recommended Order and Decision, Chief Administrative Law Judge Brian Weinthal stated that:

But more pragmatically—and contrary to Complainant's suggestion—I find that judicial economy will be better served by this administrative court issuing a ruling in advance of any decision by the United States District Court for the Northern District of Illinois. The settlement conference conducted in this matter was held before the Commission, and the various orders issued by the administrative law judges who have had a hand in this case are more easily accessible to me than to the federal court and its staff. As such, my view is that the recitation of events contained in this opinion may save time and work for Judge Alonso when assessing whether a valid settlement directs Complainant's federal causes of action to the same fate as her claims under the Human Rights Act.
5. Pursuant to Chief Administrative Law Judge Brian Weinthal's request, the Board of Education submits the attached Recommended Order and Decision as Exhibit 13 to its motion.

Respectfully submitted,

/s/ Daniel L. Polsby

CLAUSEN MILLER P.C.

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Attorneys for Defendant

**CERTIFICATE OF SERVICE AND NOTICE OF ELECTRONIC FILING**

The undersigned hereby certifies that a true and correct copy of the foregoing document was electronically filed with the Clerk of the U.S. District Court using the CM/ECF system, which sent notification of such filing to counsel of record on September 19, 2022.

Respectfully submitted,

/s/ Daniel L. Polsby